

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

DRAFT

Conditional Major, Operating

Permit: F-07-016

TI Group Automotive Systems, LLC

Cynthiana, KY 41031

Date: June 18, 2007

Sajjad Quabili, Reviewer

SOURCE ID: 21-097-00011

SOURCE A.I. #: 1769

ACTIVITY ID: APE20070001

SOURCE DESCRIPTION:

TI Group Automotive Systems makes metal tubing. At the source, steel is shaped, welded, annealed, and leak tested. The tubes made may also be copper plated or coated with Galfan (an aluminum and zinc mixture) and paint. In line #1, a scrubber is utilized to control emissions from the copper plating unit and the acid cleaning prior to coating. Emissions from the paint application are emitted uncontrolled.

COMMENTS:

TI Group applied to the Division to renew their Conditional Major operating permit. The permittee accepted source wide VOC emission limit of 90 tons per year voluntarily to avoid major source status. Emission Point # 7 was decommissioned recently.

Scrubber at Line 1

Operating procedure recommended by the manufacturer for the scrubber is not available. Therefore, the operating limits and specific monitoring requirements for the scrubber have been added to the permit. The assumed control efficiency of the scrubber is 90%.

Applicable regulations

Regulation 401 KAR 59:010, New process operations, is applicable to the 4 tube coating lines and the 3 wire brush machines since the affected facilities commenced after July 2, 1975. Particulate emissions from the process are minimal.

401 KAR 59:010 is also applicable to the welding and pipe cutting operations since the operations commenced after July 2, 1975. Particulate emissions from the process are minimal.

Precluded regulations

401 KAR 59:225, New miscellaneous metal parts and products surface coating operations, does not apply to the coating lines because the source has taken a VOC emission limit to remain below the regulation emission trigger level.

401 KAR 59:185, New solvent metal cleaning equipment, does not apply to the parts washer because the source has taken a VOC emission limit to remain below the regulation emission trigger level.

401 KAR 61:015, Existing indirect heat exchangers does not apply to the boilers because each boiler has a heat input capacity less than one million BTU/hr and they were commenced before April 9, 1972.

40 CFR 63, Subpart M-MMM-National Emission Standard for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products is not applicable due to the low hazardous air pollutant potential at the source.

EMISSION AND OPERATING CAPS DESCRIPTION:

The source-wide emission limit for VOC is 90 tons per year.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.